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September 7, 1999

Mr. Donnie L. Chumbler
Bechtel Jacobs Company LLC
West Kentucky Technology Park
761 Veteran Avenue
Kevil, Kentucky 42053

Subject: Subcontractor Compliance with AHA Program

Dear Mr. Chumbler:

Pacific Western Technologies is pleased to submit a surveillance of "Subcontractor Compliance with AHA Program." This surveillance is an assessment of Mactec's AHA program. Mactec is the Cylinder Yard Project subcontractor.

The attached checklist and summary report was developed from Exhibit G, Environment, Safety, and Health Requirements, Part II, Special Requirements, section 1.3, *Activity Hazard Assessment* and provides details of the surveillance.

If you have any questions please feel free to call me at (270) 441-5161.

Sincerely,

PWT



D. R. Lamar
Quality Engineer

Enclosure

C: Ken Campbell, PWT/OR
Emily J. Blasdel
File-EMEF-DM C-PAD-RC(2)

PWT- Oak Ridge, TN
PWT- Paducah, KY

Q-00004-0281



SURVEILLANCE CHECKLIST
Environmental Management and Enrichment Facility

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Surveillance No.: Sur: PWT-03-99		Title: Subcontractor Compliance with AHAs			
<p style="text-align: center;">PWT <i>Pacific Western Technologies</i></p>		Ref. Documents: Exhibit G, Environment, Safety, and Health Requirements. Part 11, Special Requirements, section 1.3, <i>Activity Hazard Assessment</i>			
Surveillance Checklist		Surveillance Results			
Item	Surveillance Characteristic	ACC	DEF	N/A	Comments
1.	Activity Hazard Assessments (AHAs) shall be developed at the activity/task level and shall provide a detailed, job-specific hazard assessment that addresses each step of the work process, the hazards involved, and the control for those hazards.	X			Mactec, the subcontractor for the Cylinder yard Project was assessed. AHAs were reviewed for this project
2.	Multiple AHAs should be developed for complex work or when it is necessary to distinguish between different phases of work that may involve different hazards and/or controls.	X			eleven (11) AHAs addressing each step of the process was reviewed.
3.	AHAs should clearly identify each step of the work process and provide assurance that all hazards, including those introduced by the method of accomplishment of the work, have been identified and that appropriate controls have been developed and are in place to eliminate or mitigate those hazards.	X			AHAs were developed for each task and titled so that each task was identifiable.
4.	Subcontractor will ensure that all affected personnel are briefed on the hazards they may encounter during the course of their work.	X			All personnel including other second tier subcontractors are briefed on hazards they may encounter.
5.	Subcontractor is responsible for writing the AHA and implementing it in the field as work is performed.	X			
Prepared by: D. R. Lamar		Performed by:		Date:	

SURVEILLANCE CHECKLIST
Environmental Management and Enrichment Facility

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Surveillance No.: Sur: PWT-03-99		Title: Subcontractor Compliance with AHAs			
<p style="text-align: center;">PWT <i>Pacific Western Technologies</i></p>		Ref. Documents: Exhibit G, Environment, Safety, and Health Requirements. Part 11, Special Requirements, section 1.3, <i>Activity Hazard Assessment</i>			
Surveillance Checklist		Surveillance Results			
Item	Surveillance Characteristic	ACC	DEF	N/A	Comments
6.	An AHA shall be developed to be compatible with the project schedule and shall be organized and prepared as an outline of activities of Work arranged according to the project activity/task schedule sequence.	X			A general AHA is developed for the project. Specific AHAs are developed for each task within the project.
7.	Mobilization and demobilization activities shall be included even if they are not activities listed on the schedule.	X			
8.	Subcontractors shall submit all AHAs and their revisions for Contractor review.	X			All AHAs are submitted to the STR from the STR to the Safety Advocate.
9.	Relevant portions of the AHA and applicable permits shall be reviewed with the work crew before the start of the work for each shift.	X			A toolbox meeting is held each morning for daily hazards
10.	AHA meetings shall be conducted by the cognizant Subcontractor Work Supervisor.	X			These meetings are conducted by the Mactec Health & Safety Officer
11.	Workers and supervisors directly participating in the activity shall attend the meeting. Following the review, the supervisor and workers who attended the briefing shall sign and date the document, thereby indicating that they have participated in the review and understand and will comply with the requirements.	X			A toolbox meeting is held each morning to review the daily activities and hazards associated with those activities. An attendance form is signed by the supervisor and workers in attendance.
Prepared by: D. R. Lamar		Performed by:		Date:	

SURVEILLANCE CHECKLIST
Environmental Management and Enrichment Facility

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Surveillance No.: Sur: PWT-03-99		Title: Subcontractor Compliance with AHAs			
<div style="text-align: center;"> PWT <i>Pacific Western Technologies</i> </div>		Ref. Documents: Exhibit G, Environment, Safety, and Health Requirements. Part 11, Special Requirements, section 1.3, <i>Activity Hazard Assessment</i>			
Surveillance Checklist		Surveillance Results			
Item	Surveillance Characteristic	ACC	DEF	N/A	Comments
12.	Subcontractor shall post a copy of the AHA for the current shift at access control or near the entry point where Work is being performed.	X			Copies of the AHAs are kept in open files in the construction trailer.
13.	AHAs are completed per the Activity Hazard Assessment Instruction Guidelines.	X			AHAs are completed per the Guidelines of Exhibit G.
Prepared by: D. R. Lamar		Performed by:		Date:	

Summary Report

Surveillance Number: Sur: PWT-03-99

Subcontractor Compliance with AHAs

Note: Exhibit G, Environment, Safety, and Health Requirements. Part II, Special Requirements, Section 1.3, *Activity Hazard Assessment*, was used to perform this surveillance.

Mactec, the subcontractor for the Cylinder Yard Project was assessed during this surveillance. Mactec uses a total of eleven (11) AHAs on this project. The AHAs are kept in the construction trailer and are available to all Mactec employees, as well as any of Mactec subcontractors employees. There is one general AHA for the overall project and ten additional AHAs for job-specific task to ensure control of hazards.

Each morning the Mactec Health and Safety Office conducts a toolbox meeting with the work crew to go over hazards that may encountered during the day. Records of these meeting are kept along with attendance forms.

There were no discrepancies noted during this surveillance.